



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: SRF-6J

January 11, 2010

Ms. Erin Rednour
Remedial Project Manager
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276, MC -24
Springfield, Illinois 62794-9276

Re: Comments on Demolition Work Plan, Chemetco site, Hartford, Madison County,
Illinois

Dear Ms. Rednour:

The U.S. Environmental Protection Agency has received (December 15, 2009) the Demolition Work Plan (Plan) for the Chemetco site. The EPA Superfund Division staff has reviewed the Plan and appreciates the consideration of comments to the Illinois Environmental Protection Agency (IEPA) on the Plan. The following comments are listed by corresponding Sections of the Plan.

Section 2.3 and 5.2

The difference between existing and proposed storm water management and control measures appears to be a silt fence along the southern edge of the facility site. Implementation of the proposed storm water best management practices (BMPs) should be documented in any reports required by IEPA. It is the position of EPA that discharges from Outfall #5 comply with the facility's National Pollutant Discharge Elimination System permit.

Section 3.3 and 6.7

The proposed demolition plan for the Black Acid Tank Solid Waste Management Unit (SWMU) should satisfy the State's requirements for closure under its Resource Conservation and Recovery Act (RCRA) program. The Brick Shop, which is also a SWMU, awaits(ed) approval of a completed RCRA-compliant closure. RCRA SWMUs covered by the scope of work proposed in the Plan should be closed in compliance with the State's RCRA requirements.

Section 3.4 and 6.4.3

Regarding disposal of the refractory brick, a determination should be recorded whether this is RCRA hazardous waste produced in the former Brick Shop. According to a July 2008 inter-Agency email (between Lance Range, Chris Cahnovsky, and Erin Rednour) in EPA's site file, IEPA estimates 70 tonnes of this material is on site.

Section 3.6 and 5.7

The AAF Decontamination Area and Sump is also a SWMU and the Plan proposes to complete RCRA closure before demolishing that area and document it after all demolition work described in the Plan is complete. This represents a time delay between submitting completion documents and event occurrence.

The requested modification of the Interim Order (IO), Civil Nos. 00-670-DRH and 00-677-DRH (filed 2008), described in this section of the Plan should comply with Section XXV of the IO.

Section 4.3

It is the position of EPA that all work activities at the site be performed in compliance with applicable federal and state Occupational Safety and Health Administration regulations for all types of wastes and activities at the site, and that IEPA should review the Health and Safety Plan prior to initiating field activities.

Section 4.5 and 5.10

Section VI.A.16 of the IO requires shipping manifests be submitted to the State at time of shipment, and the Plan proposes keeping records on site until work completion. This represents a time delay between submitting documents and event occurrence.

Table 1

The IO Section V.5.a requires all "work affected materials" to be managed as RCRA hazardous waste. It is appropriate to reconcile ARARs in Appendix A of IO with Table 1 of the Plan if not previously addressed.

Table 2

IEPA and EPA, among other entities, have programs that aim to handle electronic wastes in a more sustainable manner than what is proposed in the Plan.

Section 6.3 states that concrete may also go to a concrete recycling facility.

General: The Plan does not address demolition methods or impacts on refrigerants or underground structures/utilities/wells that may be encountered.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Kerr".

Michelle Kerr
Remedial Project Manager
U.S. Environmental Protection Agency
Region 5 Superfund Division

cc: Tom Martin, EPA